

EXHIBIT 1

Joint Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11 Case
	§	
Old LC, Inc., <i>et al.</i> ¹	§	Case No. 19-11791 (BLS)
	§	
Debtors.	§	Jointly Administered

Official Committee of Unsecured Creditors
of Old LC, Inc., et al., for and on behalf of
the estates of Old LC, Inc., *et al.*;

Plaintiff,

v.

Upfront V, LP, Breakwater Credit
Opportunities Fund, L.P.; Upfront GP V,
LLC; Mark Suster; Dana Kibler; Gregory
Bettinelli; Saif Mansour; Aamir Amdani;
Eric Beckman; Darrick Geant; and Joseph
Kaczorowski

Defendants.

Adv. No. 20-51002 (BLS)

JOINT STIPULATION CONCERNING BRIEFING DEADLINES

Plaintiff Official Committee of Unsecured Creditors (the “**Committee**”) of Old LC, Inc.; Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. (collectively, “**Loot Crate**” or the “**Debtors**”), and Defendants Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (collectively, the “**Breakwater Defendants**,” and collectively with the Committee, the “**Parties**”) file this *Joint Stipulation Concerning Briefing Deadlines*, and hereby stipulate and agree as follows:

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

1. On June 17, 2021, the Breakwater Defendants filed their Motion for Partial Summary Judgment (“***Partial MSJ***”) [Adv. D.I. 46-49].

2. On June 24, 2021, the Breakwater Defendants filed their Motion for Protective Order (“***PO Motion***”) [Adv. D.I. 58].

3. On June 25, 2021, Plaintiff filed its Motion to Deny or Continue Breakwater’s Motion for Partial Summary Judgment to Permit Necessary Discovery and Motion to Compel Depositions (“***Rule 56(d) Motion***”) [Adv. D.I. 60].

4. The PO Motion and the Rule 56(d) Motion are currently set for hearing on **July 22, 2021 at 11:00 a.m. (ET)**.

5. The Parties hereby agree that the deadline for Plaintiff to file its Response in Opposition to the Partial MSJ is hereby extended to **July 29, 2021 or such date as the Court may establish at the hearing on July 22, 2021**.

6. The parties further agree that Plaintiff’s Response in Opposition to the PO Motion is hereby extended to **July 12, 2021**, and the Breakwater Defendants’ Reply to its PO Motion is extended to **July 19, 2021**.

7. The parties further agree that the Breakwater Defendants’ Response in Opposition to the Rule 56(d) Motion is extended to **July 14, 2021**, and Plaintiff’s Reply to its Rule 56(d) Motion is extended to **July 20, 2021**.

[Signature Page to Follow]

Dated: June 30, 2021
Wilmington, Delaware

Respectfully submitted,

MORRIS JAMES LLP

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